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Attorneys for Defendants TRAVELERS INDEMNITY
COMPANY OF CONNECTICUT and THE TRAVELERS
INDEMNITY COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THE MICHEL FAMILY TRUST,

Plaintiff,

vs.

TRAVELERS INDEMNITY COMPANY
OF CONNECTICUT, THE TRAVELERS
INDEMNITY COMPANY, and DOES 1 to
100, inclusive,

Defendants.

CASE NO. C09-04144 PVT

**STIPULATION TO CONTINUE DATE
FOR FILING MOVING PAPERS FOR
DISPOSITIVE MOTIONS;
[PROPOSED] ORDER THEREON**

TO THE HONORABLE PATRICIA V. TRUMBULL, U.S. DISTRICT COURT MAGISTRATE
JUDGE:

STIPULATION

WHEREAS, Plaintiff MICHEL FAMILY TRUST and Defendants TRAVELERS
INDEMNITY COMPANY OF CONNECTICUT and THE TRAVELERS INDEMNITY
COMPANY ("Travelers") desire to extend the time for Travelers to file a motion for summary
judgment, without changing the hearing date or any other dates for filing opposition or reply
papers, on the following grounds:

1. Counsel for both parties have diligently worked to schedule percipient depositions,
but because of delays in document productions and scheduling depositions, Travelers has been

1 prevented from meeting the existing August 10, 2010 deadline for filing its motion for summary
2 judgment; and

3 2. This will not affect the last day for hearing dispositive motions in this matter.

4 NOW, THEREFORE, by and through their undersigned counsel of record, Plaintiff
5 MICHEL FAMILY TRUST and Defendants TRAVELERS INDEMNITY COMPANY OF
6 CONNECTICUT and THE TRAVELERS INDEMNITY COMPANY hereby stipulate to the
7 following:

8 1. The last day for Travelers to file and serve its motion for summary judgment shall
9 be August 17, 2010;

10 2. The last day for Plaintiff to file and serve its opposition to Travelers' motion for
11 summary judgment shall be August 24, 2010;

12 3. The last day for Travelers to file and serve its reply papers in support of its motion
13 for summary judgment shall be August 31, 2010; and

14 4. The last day for a hearing on dispositive motions shall remain September 14, 2010.

15 Respectfully submitted,

16 DATED: August 6, 2010

**FORAN GLENNON PALANDECH PONZI &
RUDLOFF PC**

18 By: /s/ Marjie D. Barrows
19 Marjie D. Barrows

20 Attorneys for Defendants
**TRAVELERS INDEMNITY COMPANY OF
21 CONNECTICUT and THE TRAVELERS
INDEMNITY COMPANY**

23 DATED: August 6, 2010

WILLIAMS, PINELLI & CULLEN, LLP

25 By: /s/ Amy Carlson
26 Amy Carlson

27 Attorneys for Plaintiff
MICHEL FAMILY TRUST

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ORDER

IT IS HEREBY ORDERED, pursuant to the Stipulation of the parties, as follows:

1. The last day for Travelers to file and serve its motion for summary judgment shall be August 17, 2010;
2. The last day for Plaintiff to file and serve its opposition to Travelers' motion for summary judgment shall be August 24, 2010;
3. The last day for Travelers to file and serve its reply papers in support of its motion for summary judgment shall be August 31, 2010 ; and
4. The last day for a hearing on dispositive motions shall remain September 14, 2010.

Date: August 9, 2010



PATRICIA V. TRUMBULL
UNITED STATES MAGISTRATE JUDGE